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**VIA ECF AND HAND DELIVERY**

Hon. George B. Daniels  
United States District Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

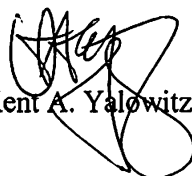
Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*  
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

I write further to the colloquy and the Court's questions at the July 28, 2015 conference regarding plaintiffs' proposed form of judgment, which sets forth both the baseline amount of the verdict and the final amount of the judgment after trebling.

Plaintiffs have requested this format for the judgment because some foreign jurisdictions will not enforce treble damages awards and may decline to enforce *in toto* judgments containing treble damages if the baseline (pre-trebling) award is not set forth separately. See Michael Polonsky, *Particular Issues Affecting the Recognition and Enforcement of U.S. Judgments*, 19 Int'l L. Practicum 156, 158 (2006). In fact, the PLO and the PA sought to block enforcement in Israel of the ATA judgment in the *Ungar* case on the basis of just such an argument. Accordingly, the best practice "for U.S. plaintiffs whose claims include . . . claims where the damages may be trebled" is to "ensure that any judgment which is obtained clearly distinguishes and separately identifies and quantifies the [trebled] compensation." *Id.* at 159.

Respectfully,

  
Kent A. Yalowitz

cc: All ECF Counsel